

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

May 22, 2006

FILED  
CLERK U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
2006 MAY 23 PM 2:40

OMAR MORRIS,	)	
	)	
Plaintiff,	)	
	)	
V.	)	Civ. No. 1:05-cv-915-KAJ
	)	
AMAZON.COM,	)	
	)	
Defendant,	)	

1. Omar Morris is a citizen of The State of Delaware residing at 36 Appleby Rd. New Castle, Delaware 19720
2. The defendant is a company in The State of Delaware at 1 Centerpoint Blvd. New Castle, Delaware 19720
3. From December 2004 to February 2005 the plaintiff worked for Amazon.com thru Integrity Staffing Solutions Temporary Service.
4. The first week of January 2005 the plaintiff was promoted to become an Amazon.com associate on February 5, 2005. This was brought to the plaintiff attention by the Overnight Picking department manager. The plaintiff then had to go thru numerous tasks, including a drug-screen, proof of diploma, and a background check the second week of January. As the month of January pass the plaintiff continues to work in his department, and also transferred to other departments to work in and learn how that area of the facilitate function. At the end of the month, Amazon.com had a welcome/ benefits meeting for all new associates for the overnight shift, where Amazon.com provided information about our benefits, position, and what they expected from us. At the meeting it was about ten new overnight associates.
5. On Friday February 4, 2005 Amazon.com called the plaintiff at his residence to notify the plaintiff not to come to work today and said to go to Integrity Staffing Solutions Temporary Service on Monday February 7, 2005.
6. consequently on Saturday February 5, 2005 the plaintiff received a letter from Comprehensive Information Services, Inc. (CIS) a notice of adverse action based on a consumer report or investigative consumer report required by § 615(a) of the fair credit reporting act. The letter as read, "Amazon.com has denied your application for employment on the basis of information contained in a consumer report or investigative consumer report (hereinafter "consumer report")".
7. Therefore On February 7, 2005 the plaintiff first went to Integrity Staffing Solutions Temporary Service, located in Newark, Delaware. The plaintiff was inform the consumer report or investigative consumer report the plaintiff conducted showed the plaintiff having several felonies, which would denied the eligibility for any human to work in the United States. Furthermore the plaintiff went to Delaware State Police Headquarters State of Delaware State Bureau Of Identification located in Dover, Delaware. Where the

plaintiff requested a Personal Criminal History Background Check. At the same time the plaintiff called Comprehensive Information Services, Inc. to dispute the accuracy of the information contained in the plaintiff consumer report. The plaintiff spoke to the General Manager, Teresa Ward (Ext.4006) well as the President of the company, Robert Capwell (Ext.4001). The plaintiff asked the Robert Capwell for a reinvestigation of the plaintiff consumer report. Afterward the plaintiff returned to Integrity Staffing Solutions Temporary Service to give them a copy of the plaintiff criminal history, the plaintiff also went to Amazon.com to speak to Ellen Kuntzman and hand her a copy of the plaintiff criminal history as well.

8. Nevertheless on February 11, 2005 the plaintiff mailed two certified letters, one to Comprehensive Information Services, Inc. and one more to Amazon.com, containing a letter disputing the accuracy of the information concerning the information contain in the plaintiff's consumer report or investigative consumer report. In addition copies of the plaintiff's criminal history Background check which the plaintiff obtained from the Delaware State Police Headquarters State of Delaware State Bureau Of Identification.
9. On February 16, 2005 the plaintiff received a letter from Comprehensive Information Services, Inc. revealing the Case #, Social Security, For Use By: Name, Company, Reference, Position Applied For, date requested, date sent, turnaround time in work days, number of sources verifying, information alert, Company/Source and Type. A reinvestigation of the plaintiff consumer report was also included. The reinvestigation read Time Period (7 years). Results (Clear).
10. Through out the months of February and March the plaintiff would call Ellen Kuntzman to speak to the human resource to ask the status coming back to work or the reemployment of the plaintiff. The human resource told the plaintiff the manager that can rehire the plaintiff was in Seattle and did not know when that can take place.
11. Therefore the plaintiff asked the court to award the plaintiff the amount of \$1,000,000.00.

*THANK YOU.*  
*Don Miller*